

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
STACY SHEGDA	:	VIOLATIONS:
GEORGE RAYMOND	:	18 U.S.C. § 1956(h) (conspiracy to commit
	:	money laundering - 1 count)
	:	18 U.S.C. § 1956(a)(3) (money laundering
	:	- 7 counts)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Between at least on or about November 9, 2007 through on or about March 7, 2008, defendant STACY SHEGDA was the manager of United Check Cashing/S&S Money Management ("UCC/SS"), located at 1606 S. Columbus Boulevard in Philadelphia, Pennsylvania.
2. Defendant GEORGE RAYMOND was an employee of UCC/SS.
3. UCC/SS is a money transfer center offering domestic and international money transmitting services to the public. UCC/SS operated as a licensed money transmitter for United Check Cashing, a money transmitter licensed in the Commonwealth of Pennsylvania. United Check Cashing has numerous money transfer locations throughout the United States and is required to comply with the anti-money laundering and currency reporting requirements of the Bank Secrecy Act, 31 U.S.C. §§ 5311-32.

4. United Check Cashing provides training to each of their agents, including UCC/SS, on the money laundering laws and currency reporting requirements. The company provides manuals and updates to all of their agents specifically advising agents as to the laws regarding illegal money laundering, the sanctions for illegal money laundering, and the requirements for reporting suspicious transactions.

5. UCC/SS received a training manual and other documentation and information from United Check Cashing regarding the reporting requirements and the possible criminal penalties associated with violating the anti-money laundering and currency transaction reporting requirements of the Bank Secrecy Act.

6. Defendants STACY SHEGDA and GEORGE RAYMOND conducted financial transactions which were represented to them by a cooperating witness (“the CW”), working at the direction of federal officials, to be money used to conduct illegal drug trafficking, in violation of Title 21, United States Code, Section 841. Specifically, with regard to these funds, defendants SHEGDA and RAYMOND exchanged money orders for cash and exchanged small denominations of bills for larger denominations of bills. Defendants SHEGDA and RAYMOND structured the transactions to evade and defeat the currency transaction reporting requirements, and permitted the exchanger to complete the transactions without showing any identification, allowing the exchanger to prevent discovery of his true identity and to evade the reporting requirements.

7. From at least on or about February 14, 2008 through on or about April 24, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**STACY SHEGDA and
GEORGE RAYMOND**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly launder money by conducting and attempting to conduct financial transactions of property represented to be that used to conduct a specified unlawful activity, that is, drug distribution, with the intent to conceal and disguise the nature, location, source, ownership, or control of property believed to be cash used in a specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

MANNER AND MEANS

It was part of the conspiracy that:

8. Defendants STACY SHEGDA and GEORGE RAYMOND offered UCC/SS's financial services to the CW who, at the direction of law enforcement, advised the defendants that the money involved in the financial transactions did not belong to him and was used in drug distribution.

9. Defendants STACY SHEGDA and GEORGE RAYMOND exchanged cash to money orders and converted cash from small denominations of United States currency to large denomination bills.

10. When defendant STACY SHEGDA was not available to help the CW, defendant GEORGE RAYMOND acted on defendant SHEGDA's behalf.

OVERT ACTS

In furtherance of the conspiracy, defendants STACY SHEGDA and GEORGE RAYMOND, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about February 14, 2008, defendant GEORGE RAYMOND accepted from the CW approximately \$26,000 in small denominations of United States currency represented to defendant RAYMOND to be money used in drug trafficking, and arranged for the CW to return the next day to pick up the same amount of United States currency in large denomination bills. Defendant RAYMOND also accepted approximately \$2,600 in fees for completing the exchange.

2. On or about February 15, 2008, defendant STACY SHEGDA laundered for the CW approximately \$26,000 in cash represented to defendant SHEGDA to be money used in drug trafficking. Defendant SHEGDA converted approximately \$26,000 from small denominations of United States currency to large denomination bills.

3. On or about March 7, 2008, defendant STACY SHEGDA laundered for the CW approximately \$20,000 in cash represented to defendant SHEGDA to be money used in drug trafficking. Defendant SHEGDA converted the approximately \$20,000 from small denominations of United States currency to large denomination bills and accepted approximately \$2,000 in fees for completing the exchange.

4. On or about April 24, 2008, defendant GEORGE RAYMOND laundered for the CW approximately \$20,000 in cash represented to defendant RAYMOND to be money used in drug trafficking. Defendant RAYMOND issued approximately \$20,000 in money orders and accepted approximately \$2,000 in fees for completing the exchange.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TWO THROUGH FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and 8 through 10 of Count One and the overt acts of Count One are realleged here.

2. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

STACY SHEGDA

knowingly conducted the following financial transactions affecting interstate commerce:

<u>Count</u>	<u>Date</u>	<u>Amount Laundered</u>	<u>Exchange Fee</u>
2	12/6/07	\$6,000	\$600
3	12/14/07	\$8,000	\$800
4	12/20/07	\$30,000	\$3,000
5	1/25/08	\$40,000	\$4,000
	TOTAL	\$84,000	\$8,400

3. When conducting the financial transactions described above, defendant STACY SHEGDA acted with the intent to conceal and disguise the nature, location, source, ownership and control of what she believed was cash used to conduct a specified unlawful activity, that is, drug distribution, and with the intent to promote the carrying on of such specified unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(3).

COUNTS SIX THROUGH EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and 8 through 10 of Count One and the overt acts of Count One are realleged here.

2. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**STACY SHEGDA and
GEORGE RAYMOND**

knowingly conducted, and aided and abetted the conducting of, the following financial transactions affecting interstate commerce:

<u>Count</u>	<u>Date</u>	<u>Amount Laundered</u>	<u>Exchange Fee</u>
6	2/14/08-2/15/08	\$26,000	\$2,600
7	3/7/08	\$20,000	\$2,000
8	4/24/08	\$20,000	\$2,000
	TOTAL	\$66,000	\$6,600

3. When conducting the financial transactions described in above, defendants STACY SHEGDA and GEORGE RAYMOND acted with the intent to conceal and disguise the nature, location, source, ownership and control of what they believed was cash used to conduct a specified unlawful activity, that is, drug distribution, and with the intent to promote the carrying on of such specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(3) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956, set forth in this indictment, defendants

STACY SHEGDA and GEORGE RAYMOND

shall forfeit to the United States of America any and all property involved in such offenses, and any property traceable to such property, including, but not limited to, the sum of \$15,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney